

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-I and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

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Dated: March 24, 2017

EXHIBIT A – ANDRUS WAGSTAFF

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-03969	Tabbatha Arnold v. American Medical Systems, Johnson & Johnson, Ethicon, Inc.
2:14-CV-14430	Tracey Lowery, Buddy Lowery v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – BELL LAW

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-14674	Univa Perry, Shane Perry v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – DISCEPOLO

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-CV-05421	Helen Eisenstein v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT D– JOHNSON BECKER

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:13-CV-25104	Tamisha Luce, Woody Luce v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-CV-08991	Charlotte Haskins v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT E – KELL LAMPIN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-09351	Mishka Lashley v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT F – LIEFF CABRASER HEIMANN & BERNSTEIN

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-29301	Kathleen Bachand, Mark Bachand v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT G – MOTLEY RICE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:16-CV-02961	Carrie Mobley v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT H – PROVOST UMPHREY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-CV-04829	Loreli Abraham and John Abraham v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT I – WEXLER WALLACE

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:14-CV-23130	Phyllis A. Kilian, Richard L. Kilian v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis